### **REMARKS**

In accordance with the foregoing, the specification, drawings and claims 1-13, 15-18, 20-22, and 45-67 are amended. No new matter is presented and approval and entry of the amended specification, drawings and claims are requested. Claims 23-44 are cancelled without prejudice or disclaimer.

Claims 1-22 and 45-67 are pending and under consideration.

Claims 1-6, 8, 9, 11, 45-50, 52, 53, 55, and 67 are rejected under 35 U.S.C. §102(e) as being anticipated by Anwar (US Pub. 2001/0047355); claims 7 and 51 are rejected under 35 U.S.C. §103(a) as being unpatentable over Anwar in view of Ortega (U.S.P. 6,401,084 B1); claims 10, 13, 16, 54, 57, and 60 are rejected under 35 U.S.C. §103(a) as being unpatentable over Anwar in view of Ferrel et al. (U.S.P. 5,907,837); claims 12 and 56 are rejected under 35 U.S.C. §103(a) as being unpatentable over Anwar in view of Rose (U.S.P. 5,752,244) and further in view of Kerven et al. (U.S.Pub. 2002/0042784 A1); claims 14 and 58 are rejected under 35 U.S.C. §103(a) as being unpatentable over Anwar in view of Ferrel and Ortega; claims 15 and 59 are rejected under 35 U.S.C. §103(a) as being unpatentable over Anwar in view of Ferrel in view of Talib et al. (U.S. Pub. 2001/0044758 A1); claims 17 and 61 are rejected under 35 U.S.C. §103(a) over Anwar in view of Rose and Ferrel; claims 18 and 62 are rejected over Anwar in view of Ortega; claims 19 and 63 are rejected over Anwar in view of Ferrel and Henkin et al. (U.S. Pub. 2002/0107735 A1); claims 20, 21, 64, and 65 are rejected over Anwar in view of Schultz (U.S.P. 5,640,553); and claims 22 and 66 are rejected under Anwar in view of Schultz and Ortega.

The rejections are traversed.

### ITEMS 1-2: OBJECTION TO DRAWINGS

In item 1 the Examiner objects to FIGs. 2, 3, 6, and 15 because of spelling errors. Item 2 objects to the drawings as FIG. 3 not containing an element labeled as 21 entitled "search results." FIGS. 2, 3, 6, and 15, are amended herein as suggested by the Examiner. (Action at page 2).

In FIGs. 2 and 6 the term "campany" is replaced with the term --company--. In FIG. 3, the term "conpanies" is replaced with the term --companies--, and the element "search results" from page 7, paragraph [0020] is labeled --21--. No new matter is added and approval of these changes to the drawings is respectfully requested.

### ITEM 3: OBJECTION TO THE SPECIFICATION

In item 3 the Examiner objects to the specification suggesting that in paragraph [0030]

the term "re-replaced" should read as --replaced--. (Action at page 2).

The specification is amended as suggested by the Examiner and withdrawal of the objection and approval of the specification is requested.

### ITEM 4: OBJECTION TO THE SPECIFICATION

In item 4 the Examiner objects to the specification under 37 CFR 1.75(d)(1) as "failing to provide proper antecedent basis for the claimed subject matter, i.e., the term --core topic-recited in claims 2 and 46 and the term --tag hierarchy-- recited in claims 15 and 59." (Action at page 3).

Applicants submit that the specification does support the terms and the claimed subject matter.

The term --core topic-- is discussed in the specification for example in paragraph [0091] that discusses "a core topic of a query is selected from the results of the analysis of the search request . . ."

Further the specification supports the term --tag hierarchy-- and the claimed subject matter. As understood in the art a hierarchy is "an organization with few things, or one thing, at the top and with several things below each other thing." (See, for example, Free-On-line Dictionary of Computing http://foldoc.doc.ic.ac.uk/foldoc/foldoc.cgi?hierarchy). Such a tag hierarchy is discussed in the specification, for example, paragraph [0079] that discusses "if a value is specified for a tag and a specified tag has a superordinate tag that covers a broader range, the name of the tag is replaced with the superordinate tag."

Withdrawal of the objection and approval of the specification is requested.

### **ITEM 5: OBJECTION TO CLAIMS 4 AND 6**

The Examiner objects to claims 4 and 6 because of informalities. (Action at page 3). In claim 4 the term "detailedness" is replaced with --detail, and in claim 6 the term "are" is replaced with the term --is--, as suggested by the Examiner.

Withdrawal of the objection and approval of claims 4 and 6 is requested.

## ITEM 6: REJECTION OF CLAIMS 1-22 AND 45-67 UNDER 35 U.S.C. §112, FIRST PARAGRAPH

The Examiner rejects claim 1-22 and 45-67 under 35 U.S.C. §112, first paragraph contending that the specification "does not reasonably provide enablement for the analysis of an intention of a query through a query intention analysis step." (Action at page 4).

Applicants submit that the Examiner does not support the rejection with any findings of

fact, and has not established a reasonable bases to question enablement as required.

As set forth in MPEP § 2164.04 entitled Burden on The Examiner Under the Enablement Requirement:

the examiner has the initial burden to establish a reasonable basis to question the enablement provided for the claimed invention . . . the examiner must provide a reasonable explanation as to why the scope of protection provided by a claim is not adequately enabled by the disclosure.

If the Examiner is suggesting that the claimed subject matter is only presented in the claims, but not in the specification, then an objection should have been made to the specification instead of rejecting the claims.

Further, the specification includes supporting description for the claims, see for example, paragraphs [0022]-[0026].

Applicants submit that claims 1-22 and 45-67 comply with 35 U.S.C. §112, first paragraph and request the rejection be withdrawn and claims 1-22 and 45-67 allowed.

### ITEM 7: REJECTION OF CLAIMS 21 AND 65 UNDER 35 U.S.C. §112, FIRST PARAGRAPH

The Examiner rejects claims 21 and 65 under 35 U.S.C. §112, first paragraph, contending that the "specification does not reasonably provide enablement for replacement of a list with a tag value." (Action at page 4).

Applicants submit that the Examiner has not met the initial burden as set forth by MPEP §2164. Further, Applicants submit that the specification includes supporting description for the claims, see for example, paragraphs [0096]-[0100].

Applicants submit that claims 21 and 65 comply with 35 U.S.C. §112, first paragraph and request the rejection be withdrawn and claims 1-22 and 45-67 allowed.

## ITEM 8: REJECTION OF CLAIMS 1, 45, AND 67-UNDER 35 U.S.C. §112, SECOND PARAGRAPH

In item 8, the Examiner rejects claims 1, 45, and 67 and contends that "the specification does not clearly define the scope of the 'intention' of a query." (Action at pages 4-5).

Applicants submit that the Examiner is attempting to unnecessarily limit the scope of the claims, and that as set forth in MPEP §2164.08:

(c)laims are not rejected as broader than the enabling disclosure under 35 U.S.C. 112 for noninclusion of limitations dealing with factors which must be presumed to be within the level of ordinary skill in the art; the claims need not recite such factors where one of ordinary skill in the art to whom the specification and claims are directed would consider them obvious.

As recited by claim 1, for example, and supported by paragraph [0015] for example, an

analysis of an intention of a query is "based on the result of the analysis of said search request (provided by said user)." That is, the intention defined by the user's search request.

Applicants submit that claims 1, 45, and 67 comply with 35 U.S.C. §112, second paragraph and request the rejection be withdrawn and claims 1, 45, and 67 allowed.

## ITEM 9: REJECTION OF CLAIMS 18 AND 62 UNDER 35 U.S.C. §112, SECOND PARAGRAPH

The Examiner rejects claims 18 and 62 contending that it is unclear as to whether the search criteria or the main item list is generated and whether repeating of the search in each of the main items is part of the search criteria generation. (Action at page 5).

Claims 18 and 62 are amended herein, using claim 18 as an example, to recite that the method includes" wherein search criteria, for an item on a main item list provided in advance, are generated for a topic in the search request for which no correspondence to an item in the database is found at said generating search criteria-and further comprises repeating the search in each of the main items and presenting the search results to the user."

Applicants submit that claims 18 and 62 comply with 35 U.S.C. §112, second paragraph and request the rejection be withdrawn and claims 18 and 62 be allowed.

# ITEMS 10, 12, 13: REJECTION OF CLAIMS 1, 4, 16, 45, 48, 60 AND 67 UNDER 35 U.S.C. §112, SECOND PARAGRAPH

The Examiner contends claims 1, 45, and 67 contain insufficient antecedent basis for the terms "the result of the analysis," the "the intention," "the output format," and "the result of said analysis," claims 4 and 48 contain insufficient antecedent basis for the feature "the specific items," and claims 8 and 52 and claims 16 and 60 contain insufficient antecedent basis for the respective terms "the description", "said search request generation", and "the analysis of the correspondence."

Claims 1, 4, 16, 45, 48, 60 and 67 are amended herein.

Applicants submit that claims 1, 4, 16, 45, 48, 60 and 67 comply with 35 U.S.C. §112, second paragraph and request the rejection be withdrawn and claims 1, 4, 16, 45, 48, 60 and 67 be allowed.

# ITEM 11: REJECTION OF CLAIMS 3 AND 47 UNDER 35 U.S.C. §112, SECOND PARAGRAPH

The Examiner contends that claims 3 and 47 are unclear as whether the limitation is claiming that the search results of the presentation items are to be ordered.

Claims 3 and 47 are amended herein, using claim 3 as an example, to recite that

"wherein said formatting the output comprises processing information by ordering the search results of the presentation items."

Applicants submit that claims 3 and 47 comply with 35 U.S.C. §112, second paragraph and request the rejection be withdrawn and claims 3 and 47 be allowed.

## ITEM 16: REJECTION OF CLAIMS 21 AND 65 UNDER 35 U.S.C. §112, SECOND PARAGRAPH

The Examiner contends that claims 21 and 65 are unclear as to whether the secondary database that holds values of tags and the secondary database relating to an item in search criteria is first searched, are the same database.

Claims 21 and 65 are amended herein to indicate the secondary database is the same database.

Applicants submit that claims 21 and 65, both as amended, comply with 35 U.S.C. §112, second paragraph and request the rejection be withdrawn and claims 21 and 65 be allowed.

# ITEMS 17-18: REJECTION OF CLAIMS 20, 22, 64 and 66 UNDER 35 U.S.C. §112, SECOND PARAGRAPH

The Examiner rejects claims 20, 22, 64, and 66 contending it is unclear whether the text is actually entered to be added into the database or if it is entered to be searched in the database.

Claims 20, 22, 64, and 66 are amended herein to indicate that, using claim 20 as an example, "wherein the database to be searched is a text base structured with tags and, when text to be searched is entered into the database."

Applicants submit that claims 20, 22, 64, and 66, all as amended, comply with 35 U.S.C. §112, second paragraph and request the rejection be withdrawn and claims 20, 22, 64, and 66 be allowed.

# ITEM 19: REJECTION OF CLAIMS 21 AND 65 UNDER 35 U.S.C. §112, SECOND PARAGRAPH

The Examiner contends that claims 21 and 65 are unclear as to "why the list of values would be replaced with a value specified for a tag, when the list is not being used in the search."

Applicants submit that as recited by claim 21, for example, "a list of values for a key item is generated from a search set obtained" and claim 21 further recites that "the list is replaced with a value specified for the tag to search through the main database." That is, a list is generated, and for a search the list replaced with a value specified for a tag to facilitate the search as in paragraphs [0080]-[0083].

Applicants submit that claims 21 and 65 comply with 35 U.S.C. §112, second paragraph and request the rejection be withdrawn and claims 21 and 65 be allowed.

## TRAVERSE OF ITEMS 20-42: REJECTIONS UNDER 35 U.S.C. §102 AND 35 U.S.C. §103

Users desire a system that provides more than a limited number of unambiguous answers in response to a query or text-based searches that yield a large number of ambiguous answers requiring further selection and extrAction by the user.

According to an aspect of the present invention, an intention of a query is provided by a user to reduce search result information to an amount manageable for the user, result information is sorted out and presented in an easily readable form to the user by selecting information

Anwar discloses (See for example paragraph [0004]) a system displaying results and questions which the user activates and/or investigates. Anwar, further discloses (See for example paragraph [0014]) a presentation to a user in a predetermined statistically significant order.

Ortega discloses (See for example cols. 1-2, starting at line 65) a system for correcting misspelled terms within search queries.

Ferrel discloses (See for example, col. 4 starting at line 1) an information retrieval server that indexes and searches content objects in titles in an on-line network.

Rose discloses (See for example, col. 2 lines 5-25) a check-in of a multimedia asset including prompting a user for characteristics of the information and a user selectively checking out multimedia from a database.

Kervan discloses (See for example, paragraph [0025]) a system for searching and analysis including a data store for storing records created or modified during search, rating and analysis and a network computer to execute the searching rating and analysis.

Talib discloses (See for example paragraph [0035]) a search tool allowing a user to navigate through an electronic product catalog using a selection of taxonomies.

Henkin discloses (See for example paragraph [0007]) generating markup information to be displayed on a client computer system including a client system with memory configured to store at least one update file which comprises keyword information relating to keywords suitable for markup, and an update file generated at a remote server system and downloaded to the client system.

Schultz discloses a method (See for example col .4, lines 5-25) for identifying a textual document an multimedia file with a single search query in a natural language format and searching an index database.

An *arguendo* combination of Anwar and Ortega is a system displaying results and questions to a user in a predetermined statistically significant order which the user activates and/or investigates; and correcting misspelled terms within search queries.

An arguendo combination of Anwar and Ferrel is a system displaying results and questions to a user in a predetermined statistically significant order which the user activates and/or investigates server, and a server that indexes and searches content objects in titles in an on-line network.

An arguendo combination of Anwar, Rose, and Kervan is a system displaying results and questions to a user in a predetermined statistically significant order which the user activates and/or investigates; a checking of a multimedia asset including prompting a user for characteristics of the information and a user selectively checking out multimedia from a database to a user in a predetermined statistically significant order which the user activates and/or investigates and a server that indexes and searches content objects in titles in an on-line network

An arguendo combination of Anwar, Ferrel, and Ortega is a system displaying results and questions to a user in a predetermined statistically significant order which the user activates and/or investigates server, and a server that indexes and searches content objects in titles in an on-line network and correcting misspelled terms within search queries.

An arguendo combination of Anwar, Ferrel, and Talib is a system displaying results and questions to a user in a predetermined statistically significant order which the user activates and/or investigates server, and a server that indexes and searches content objects in titles in an on-line network, and a search tool allowing a user to navigate through an electronic product catalog using a selection of taxonomies

An arguendo combination of Anwar, Rose, and Ferrel is a system displaying results and questions to a user in a predetermined statistically significant order which the user activates and/or investigates; a checking of a multimedia asset including prompting a user for characteristics of the information and a user selectively checking out multimedia from a database to a user in a predetermined statistically significant order which the user activates and/or investigates.

An arguendo combination of Anwar, Ferrel, and Henkin is a system displaying results and questions to a user in a predetermined statistically significant order which the user activates and/or investigates server, and a server that indexes and searches content objects in titles in an on-line network and generating markup information to be displayed on a client computer system including a client system with memory configured to store at least one update file which comprises keyword information relating to keywords suitable for markup, and an update file generated at a remote server system and downloaded to the client system.

An arguendo combination of Anwar and Schultz is a system displaying results and questions to a user in a predetermined statistically significant order which the user activates and/or investigates identifying a textual document an multimedia file with a single search query in a natural language format and searching an index database.

An arguendo combination of Anwar, Schultz, and Ortega is a system displaying results and questions to a user in a predetermined statistically significant order which the user activates and/or investigates identifying a textual document an multimedia file with a single search query in a natural language format and searching an index database a system for correcting misspelled terms within search queries.

In contrast to the cited art independent claims 1, 45, and 67, respectively recite a query-and-response processing method for receiving a search request concerning a query input by a user and searching a database to present search results to the user, a computer readable medium containing a query-and-response processing program, and a query-and-response processing apparatus, using claim 1 as an example, "generating search criteria based on a result of the analysis of said search request; searching said database according to the generated search criteria; analyzing an intention of the query based on the result of the analysis of said search request; formatting an output by selecting items to be presented to the user and determining an output format of search results according to a result of said analysis of the intention of said query; presenting data to said user."

Applicants submit that Anwar does not disclose, discuss or suggest features of formatting an output by <u>selecting</u> items to be presented to the user and <u>determining</u> an output format of search results according to a result of said analysis of the intention of said query and presenting data to said user as the Examiner contends.

Anwar merely discusses (See, for example, paragraph [0014]) that results "are presented to a user in a <u>predetermined</u> statically significant order so that the user can enhance the information retrieval content of his /her original query." (Emphasis added).

That is, Anwar does not discuss a formatting by selecting and deterring an output format, but only a format that is predetermined and then modified by the user.

Further, Anwar does not discuss or suggest analyzing an <u>intention</u> of a query based on a result of the analysis of said search request. Anwar merely discloses, paragraph [0009], analyzing a query including "determining keywords."

Since features of independent claims 1, 45, and 67 are not disclosed, discussed or suggested by the cited art, alone or in combination, the rejection should be withdrawn and claims allowed.

Further, dependent claims recite features not disclosed, discussed, or suggested by the cited art. For example, in contrast to the cited art dependent claim 2 and 46, using claim 2 as an example, recite "analyzing the query intention comprises determining a topic item, said <u>topic item</u> being a <u>core topic</u> of the search request; and said formatting the output comprises selecting an item to be presented to said user based on the determination as to whether or not the item is the <u>topic item</u>." (Emphasis added).

Anwar does not disclose discuss or suggest such a use of a "core" topic. Anwar merely discusses determining keywords associated with a query.

In contrast to the cited art, dependent claims 6 and 50, using claim 6 as an example, recite formatting the output comprises using "data specifying an item relating to a particular item to add the item relating to the particular item to the items to be presented, after the items to be presented to said user are determined." Anwar paragraph [0027] merely discloses "routines to receive a query and to post a query "as is."

In contrast to the cited art, dependent claims 8 and 52, using claim 8 as an example, recite formatting the output comprises "removing an item used as the search criteria from presentation items after the presentation items are determined and adding the value of said item to the presentation items as a description of said presentation items." (Emphasis added).

Anwar paragraph [0027] merely discloses "routines to receive a query and to post a query "as is."

In contrast to the cited art, dependent claims 7 and 51, using dependent claim 7 as an example, recite "generating search criteria comprises storing information about correspondence between a word used for specifying search criteria in an item in the database and an item name in the database; and said formatting the output comprises replacing said item name in the database with said word to present said search results."

The Action concedes that Anwar does not "teach storing information about correspondence between a word used for specifying search criteria in an item in the database and an item name in the database as well as replacing said item name in the database with said word to present said search results." (Action at page 12).

In item 30, the Examiner contends the features of claims 7 and 51 are disclosed in combination with Ortega and there is motivation to modify Anwar. Applicants submit, however, that there is no reasonable expectation of success to combine a system discussed by Anwar for displaying results and questions to a user in a predetermined order with a system discussed by Ortega that predicts a spelling based on a multiple-term query.

In contrast to the cited art claims 10 and 54, using claim 10 as an example, recite generating search criteria comprises "providing an item database containing all the values in a particular item that are held in a database to be searched; and, if a specified value in criteria specification generated for an item is not contained in said item database, providing an alert to the user for indicating a search failure and the cause thereof before executing the entire search process. In contrast to the cited art claims 13 and 57 recite, using claim 13 as an example, "generating search criteria to be first used in said searching; determining whether the search succeeds or fails based on the number of results of the search performed at said searching widening the search criteria so as to increase the number of search sets upon determining the search fails; and widening the search criteria and repeating the search until the search succeeds or the search criteria become unable to be widened." In contrast to the cited art claims 16 and 60 "if the analysis at said search request analysis fails, an alert concerning the form of the search request is provided; and it is determined whether or not an item extracted as a topic in the search request at a generating a search request corresponds to an item in the database to be searched, and, if an analysis of the correspondence fails, an alert is provided to the user for indicating that the query is outside the scope of the system."

The Action concedes that Anwar fails to discuss providing an alert to the user for indicating a search failure and the cause thereof before executing the entire search process. (Action at page 13). The Action further concedes that Anwar "fails to teach determining whether the search succeeds or fails based on the results of the search performed, widening search criteria so as to increase the number of search sets if the search fails, and repeatedly widening the search criteria until the search succeeds or the search criteria becomes unable to be widened." (Action at page 14). The Action further concedes that Anwar "fails to teach an alert concerning the form of the search request if the analysis at said search request analysis step

fails and an alert indicating that the query is outside the scope of the system if the analysis of the correspondence fails." (Action at pages 15-16).

In items 31-34, the Examiner contends these features are discussed by Anwar in combination with Ferrel and there is motivation to combine the art.

Applicants submit, however, that there is no reasonable expectation of success to combine a system discussed by Anwar for displaying results and questions to a user in a predetermined order with a system discussed by Ferrel that predicts based on a multiple-term query.

In contrast to the cited art dependent claims 12 and 56 recite generating search criteria comprises presenting to a user an alternative to a specified value in an item, and, if said alternative is accepted by said user, storing the pair of the originally specified value and the alternative as synonymous words for the value in an item to use said pair to automatically widen criteria during the generation of search criteria.

The Action concedes that Anwar does not discuss storing a pair of an originally specified value and an alternative as synonymous words for a value in an item to use the pair to automatically widen criteria during generation of search criteria and that Rose does not discuss automatic widening of criteria during generation of search criteria. (Action at page 17).

In item 35, the Examiner contends that the features are discussed in a combination of Anwar, Rose and Kerven. Applicants submit, however, that there is no reasonable expectation of success to combine a system discussed by Anwar for displaying results and questions to a user in a predetermined order with a system discussed by Rose prompting a user for characteristics of the information and further with a server discussed by Kerven that indexes and searches content objects in titles in an on-line network

In contrast to the cited art dependent claims 14 and 58 recite "if an item in the database to be searched is configured so as to correspond to a particular event, value specification for a particular item is extended to value specification for an event relating to the event associated with said item to widen search criteria."

In item 36, the Action concedes that the combination of Anwar/Ferrel does not discuss features of a value specification for a particular item in the database being extended to the value specification for an event relating to the item. The Examiner contends, however, that the features are discussed in combination with Ortega.

Applicants submit, however, that there is no reasonable expectation of success to

combine a system discussed by Anwar for displaying results and questions to a user in a predetermined order with a system discussed by Ortega that predicts a spelling based on a multiple-term query.

Referring to claims 15 and 59, the Action concedes that Anwar fails to disclose a database to be searched that is composed of structured text and structure tags with corresponding text, and that Anwar/Ferrel fails to disclose that a structure tag is replaced with a tag covering a broader text range in a tag hierarchy to widen the search criteria. (Action at page 20).

In item 37, the Examiner contends however, that the features are discussed in combination with Talib. Applicants submit, however, that there is no reasonable expectation of success to combine a system discussed by Anwar for displaying results and questions to a user in a predetermined order with a system discussed by Talib using a selection of taxonomies.

Referring to claims 17 and 61, the Action concedes that Anwar "fails to disclose a list of keywords that is unique to each of various areas and is used to determine the area of the search request. In addition, Anwar falls to disclose an alert that is provided to the user for indicating that the query is outside the scope the system if it is determined that the area of the search request is not addressed by the system." The Action also concedes that Rose "is silent as to an alert that is provided to the user for indicating that a query is outside the scope a system if it is determined that the area of a search request is not addressed by the system." (Action at pages 21-22).

In item 38, the Examiner contends the features are discussed in a combination of Anwar, Rose, and Ferrel. Applicants submit, however, that there is no reasonable expectation of success to combine a system discussed by Anwar for displaying results and questions to a user in a predetermined order with a system discussed by Rose prompting a user for characteristics of the information.

Referring to claims 18, 40, and 62, the Action concedes that Anwar does not discuss "search criteria for an item on a main item list provided in advance are generated for a topic in a search request for which no correspondence to an item in a database is found at said search criteria generation step to repeat the search in each of the main items and present the search results to a user." (Action at page 23)

In item 39, the Examiner contends, however, that the features are discussed in combination with Ortega. Applicants submit, however, that there is no reasonable expectation of success to combine a system discussed by Anwar for displaying results and questions to a user

in a predetermined order with a system discussed by Ortega that predicts a spelling based on a multiple-term query.

Referring to claims 19 and 63, the Action concedes that Anwar fails to discuss that a database to be searched is a text base structured with tags, and if analysis of a search request shows that the query is about a word without tag, the word is first used to perform a simple keyword search without tag and the results of the search are classified by tag added to words to be searched to present the results to the user. The Action further concedes that Ferrel does not discuss "wherein if analysis of a search request shows that the query is about a word without tag, the word is first used to perform a simple keyword search without tag and the results of the search are classified by tag to present the results to the user."

In item 40, the Examiner contends however, that the features are discussed by Anwar, Ferrel, and Henkin in combination. (Action at pages 24-25). Applicants submit, however, that there is no reasonable expectation of success to combine a system discussed by Anwar for displaying results and questions to a user in a predetermined order with a system discussed by Ferrel that predicts based on a multiple-term query and yet further with a system discussed by Henkin with an update file generated at a remote server system and downloaded to the client system.

Referring to claims 20, 21, 64, and 65, the Action concedes that Anwar fails to discuss "a text base database to be searched that is structured with tags in a main database; a provided list of items essential to a subject that is referenced to determine whether or not an essential item for one of items constituting a subject of the text to be entered is described in the text; searching a secondary database provided for the missing item by specifying a key item of the subject in the text to be entered and having the text complemented with a value obtained; replacing the list with a value specified for the tag to search through the main database." (Action at page 26).

In item 41, the Examiner contends that features are discussed by Shultz and there is motivation to combine the art. Applicants submit however that Applicants submit, however, that there is no reasonable expectation of success to combine a system discussed by Anwar for displaying results and questions to a user in a predetermined order with a system discussed by Schultz identifying a textual document with a single search query in a natural language format and searching an index database.

Referring to claims 22 and 66, the Action concedes that Anwar does not discuss "a database to be searched that is a text base structured with tags; values for individual items are extracted and entered into individual databases at the same time when text is entered into the

text database; and a group of spellings resembling each other is retrieved from each of the individual databases after the completion of the entry to enable a precise detection of variations in notation compared with that in a case where the entire text is searched." (Action at page 28). The Action also concedes that Schultz does not discuss "retrieval of a group of spellings resembling each other after completion of input of a search query." (Action at page 29).

In item 42, the Examiner contends, however, that the features are discussed by the combination of Anwar, Schultz, and Ortega. Applicants submit however that Applicants submit, however, that there is no reasonable expectation of success to combine a system discussed by Anwar for displaying results and questions to a user in a predetermined order with a system discussed by Schultz identifying a textual document with a single search query in a natural language format and searching an index database, and yet further by a system discussed by Ortega discussing an on-line network and correcting misspelled terms within search queries.

### CONCLUSION

Since features of claims 1-22 and 45-67 are not disclosed, discussed or suggested by the cited art, alone or in combination, the rejection should be withdrawn the claims 1-22 and 45-67 allowed.

### CONCLUSION

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early Action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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Date: November 12,2004

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